



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz and Jessica Karls-Ruplinger
Clearinghouse Co-Directors

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 13-109

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated November 2011.]

2. Form, Style and Placement in Administrative Code

- a. In the enumeration of sections treated by the proposed rule, it appears the department should refer to the creation of OT 4.02 (2) (j) to (r), rather than pars. (j) to (q).
- b. In the treatment clause for SECTION 6, “(intro.)” should be inserted after “3.05”.
- c. In s. OT 3.02, “~~November 1~~ June 1” should be replaced with “~~November~~ June 1”. This comment also applies to s. OT 3.05.
- d. In the treatment clause for SECTION 9, a comma should be inserted after “(intro.)”.
- e. In s. OT 4.03 (1) (a), “~~components~~” should be inserted before “skills”.
- f. In the treatment clause for SECTION 13, “is” should be deleted and replaced with “and (a) are”.
- g. In s. OT 4.03 (2) (title), the closed parentheses should not be stricken.
- h. In s. OT 4.03 (5) (b), “performance₂ ~~areas~~ skills, ~~and~~” should be replaced with “performance ~~areas~~ and, skills.”
- i. In the treatment clause for SECTION 18, “(intro.)” should be inserted after “(6)”.

3. Conflict With or Duplication of Existing Rules

Is s. OT 2.07 (6) in conflict with sub. (4) which also addresses expiration of temporary licenses?

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. In s. OT 1.02 (1), “required” in the phrase “required actions” should be deleted because it is repetitive. Also in that subsection, a comma should be inserted after “body functions” because it is the last item before “and” in a list of more than two items. This latter comment also applies to subs. (4), (7), (9), (11), (21), and (26) and ss. OT 4.02 (2) (a) and (j) and 4.03 (5) (c).

b. In s. OT 1.02 (6), “and” before “spirituality” should be deleted. Also, “body structures that reside within the client and may affect” could be replaced with “body structures of the client that may affect”.

c. In s. OT 1.02 (17), should “education” be replaced with “evaluation”?

d. In s. OT 1.02 (18), the use of parentheses should be avoided. [s. 1.01 (6), Manual.] Instead, the listed items should be separated by commas and follow “such as” or “including”. Also in that subsection, “and” should be inserted before “social”.

e. In s. OT 1.02 (24), it appears that the comma after “environments” should be deleted and replaced with “or”. Also, should “any” or “the” be inserted before “discrepancy”?

f. In s. OT 3.05, it may be clearer to replace “odd numbered years” with “an odd-numbered year”.

g. In s. OT 3.06 (r) Table, “Ethics Courses” should not be capitalized. Also, each phrase in sub. (r) should end with a period.

h. In s. OT 4.02 (2) (intro.), “, but are not limited to” should be deleted because it has the same meaning as “include”. [s. 1.01 (7) (d), Manual.] This comment also applies to s. OT 4.05 (6).

i. In s. OT 4.02 (2) (r), “and” should be inserted before “pain management”.

j. In s. OT 4.03 (2) (a), the “or” following “dentist” should be stricken and a comma should be inserted.

k. In s. OT 4.03 (2) (e), “Orders” should be replaced with “Order”. Alternatively, “referral” should be stricken and replaced with “referrals” and “is” should be stricken and replaced with “are”.